



Waymo LLC  
1600 Amphitheatre Pkwy  
Mountain View, CA

May 1, 2020

California Public Utilities Commission  
Consumer Protection & Enforcement Division  
License Section  
505 Van Ness Ave. San Francisco, CA 94102

**Re: Request for Renewal of GO 157-E Exemption  
CPUC Drivered AV Passenger Service Pilot Program (TCP No. 38152)**

Pursuant to California Public Utilities Commission ("CPUC" or "Commission") General Order ("GO") 157-E, Section 8.02, Waymo LLC ("Waymo") hereby respectfully submits this request to renew its existing exemption from GO 157-E, Section 5.03 for a period of twelve (12) months commencing immediately after the July 1, 2020 expiration date.

Waymo joined the Commission's Drivered Autonomous Vehicle ("AV") Pilot Program on July 2, 2019. Operating condition No. 14 of Waymo's charter-party carrier ("TCP") permit sets forth Waymo's existing exemption from GO 157-E, Section 5.03, and is valid for the shorter of 12 months, or the duration of the Commission's AV pilot program. Indications are that the Commission's AV pilot program will extend beyond the July 1, 2020 expiration date of Waymo's existing exemption. Accordingly, Waymo seeks the timely approval of a 12-month renewal of its Section 5.03 exemption, and provides the requisite updated justification in support of this request. As detailed more fully below, per Section 8.02, maintaining Waymo's exemption will advance the purpose of the Commission's AV pilot program, and will allow Waymo to continue to operate in a manner that is functionally equivalent to that which is required by Section 5.03.

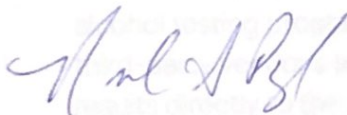
Per Section 5.03, every driver of a vehicle under the supervision of a TCP permit holder must be: (1) an employee of the permit/certificate holder, (2) an employee of a sub-carrier, or (3) an independent owner-driver who holds charter-party carrier authority and is operating as a sub-carrier. Waymo's existing exemption allows Waymo to engage experienced third-party vendors whose full-time employees serve as test drivers in Waymo's CPUC pilot.

Waymo's experience participating in the Commission's AV pilot program to date bears out the benefits of operating and scaling a meaningful pilot in partnership with an experienced and specialized third-party vendor. Waymo's third-party vendor has been, and continues to be, well-positioned to deploy its driver resources and knowledge of the transportation industry to support Waymo's pilot operations. As Waymo pursues the technological development of fully driverless vehicles, use of third-party vendor-employed drivers has enabled Waymo to generate and submit to the Commission operational data, in furtherance of the purpose of the AV pilot.

In addition, Waymo's operations with drivers employed by a third-party vendor are functionally equivalent to the operations otherwise required by Section 5.03 of GO 157-E. All drivers engaged through Waymo's third-party vendor for purposes of participating in the Commission's pilot program are subject to all applicable safety requirements for training and monitoring, including, but not limited to, (a) controlled substance and alcohol testing, and (b) motor vehicle records monitoring by enrollment in the Department of Motor Vehicles ("DMV") Pull Notice Program. Similarly, all third-party drivers hold a DMV AV Test Vehicle Operator Permit, and are subject to all requirements that the DMV imposes on test drivers, including test driver training. Waymo and its third-party vendor share a strong team culture of safety, professionalism, and personal responsibility.

For the above reasons, Waymo respectfully requests that Commission staff grant Waymo's request to renew its existing exemption from Section 5.03 of GO 157-E, pursuant to the delegated authority contained in GO 157-E, Section 8.02.

Respectfully,



Neela Paykel  
Deputy General Counsel



**DECLARATION OF NEELA PAYKEL IN SUPPORT OF  
WAYMO LLC'S REQUEST FOR RENEWAL OF EXEMPTION**

WHEREAS, I am Deputy General Counsel of Waymo LLC ("Waymo"). My office is located at 1600 Amphitheatre Plaza, Mountain View, California, 94043.

WHEREAS, I provide this declaration in furtherance of the Request for Renewal of Exemption that Waymo submits herewith to the California Public Utilities Commission ("Commission").

WHEREAS, Waymo's Request for Renewal of Exemption seeks to extend Waymo's existing exemption from Section 5.03 of GO 157-E, originally granted on July 2, 2019, so that Waymo may continue to engage the full-time employees of Waymo's third-party vendor as test drivers in Waymo's Drivered AV Pilot, under TCP No. 38152; and

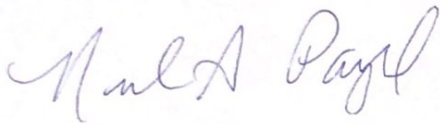
WHEREAS, Waymo's Request for Renewal of Exemption is submitted pursuant to General Order ("GO") 157-E, Section 8.02, which, in relevant part, authorizes Commission staff to grant a renewal of exemption for a period of up to 12 months.

NOW THEREFORE, ON BEHALF OF WAYMO, I, NEELA PAYKEL, DECLARE AS FOLLOWS:

1. Waymo contractually requires that Waymo's third-party vendor cause all drivers that they employ and assign to Waymo to participate in a controlled substance and alcohol testing program that complies with General Order 157-E. Waymo's third-party vendor's testing program consultant is required to provide testing results directly to the CPUC upon request.
2. All drivers employed by Waymo's third-party vendor and assigned to Waymo are enrolled in the California DMV's Employer Pull Notice program under Waymo's account.
3. Waymo contractually requires its third-party vendor to have in place workers' compensation insurance in accordance with California Labor Code Section 3602(d)(1).

4. Waymo's auto liability insurance policy covers vehicles owned by Waymo, including, but not limited to, vehicles equipped with Waymo's "Self Driving System." Waymo's liability insurance policy covers persons operating the vehicles with the express or implied permission of Waymo, including employees of Waymo's third party vendor assigned to Waymo, while acting within the scope of their employment.
5. All drivers employed by Waymo's third-party vendor and assigned to Waymo receive safety education and training consistent with the "Test Driver Training Program Outline" submitted to the Commission with Waymo's approved Drivered AV Pilot Program application.

Executed in Orinda, California on May 1, 2020,

A handwritten signature in blue ink, appearing to read "Neela Paykel". The signature is fluid and cursive, with the first name "Neela" and last name "Paykel" clearly distinguishable.

Neela Paykel  
Deputy General Counsel